

Stern, Lavinthal & Frankenberg, LLC

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Attorneys for Secured Creditor,

**Cenlar FSB as servicing agent for
SecurityNational Mortgage Company**

By: Maria Cozzini, Esq.

In Re:

Juan Pablo Cardona,

Debtor(s).

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE

Chapter 13

Case No. 21-10499-JKS

Hearing Date:

NOTICE OF OBJECTION TO CONFIRMATION OF PLAN

PLEASE TAKE NOTICE that **Cenlar FSB as servicing agent for SecurityNational Mortgage Company** ("Secured Creditor"), the holder of a mortgage on the real property of the debtor(s), known as **3644 Gloucester CV, Memphis, Tennessee 38135**, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor(s) Chapter 13 Plan proposes to pay Secured Creditor **\$0.00** in pre-petition arrears. However, Secured Creditor's Proof of Claim, which will be filed prior to the deadline for filing claims, will contain arrears of approximately **\$0.00**. Therefore, Debtor's plan as proposed is not feasible and should be denied.
2. Debtor(s) Plan does not provide any provision for post-petition payments on Creditor's Mortgage. The Plan is silent as to the mortgage held against the Tennessee property. Creditor objects to any Plan that does not require the Debtor to make contractual payments due on the mortgage loan.
3. Debtor seeks to modify the rights of Secured Creditor, which is the holder of a claim secured only by a security interest in real property that is the principal residence of the debtor(s).
4. Debtor(s) proposed plan fails to comply with the requirements of the Bankruptcy Code and is not proposed in good faith.
5. Debtor(s) proposed plan does not provide that Secured Creditor retain its lien.
6. Debtor(s) proposed plan is not feasible.
7. Debtor(s) proposed plan fails to comply with other applicable provisions of Title 11.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. Section 1325(a)(4) and 1325(b), et seq. unless the plan provides for full payment of the claim.

Stern Lavinthal & Frankenberg LLC
Attorneys for the Secured Creditor,
**Cenlar FSB as servicing agent for SecurityNational
Mortgage Company**
/s/ Maria Cozzini, Esq.

Dated: March 3, 2021

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c)	
Stern, Lavinthal & Frankenberg, LLC 105 Eisenhower Parkway, Suite 302 Roseland, New Jersey 07068 Telephone Number (973) 797-1100 Telecopier Number (973) 228-2679 Email: mcozzini@sternlav.com Attorneys for Creditor, Cenlar FSB as servicing agent for SecurityNational Mortgage Company By: Maria Cozzini, Esq.	
In Re: Juan Pablo Cardona, Debtor(s).	Case No. 21-10499-JKS Chapter: 13 Judge: John K. Sherwood

CERTIFICATION OF SERVICE

- I, Jennifer Blanchard ,
☐ represent the _____ in the above-captioned matter.
☒ am the secretary/paralegal for Stern, Lavinthal & Frankenberg, LLC, who represents the Secured Creditor in the above captioned matter.
☐ am the _____ in the above case and am representing myself.
- On March 3, 2021, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below: Plan Objection.
- I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: March 3, 2021

/s/ Jennifer Blanchard
Jennifer Blanchard

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Juan Pablo Cardona 99 Manchester Place Newark, NJ 07104	Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
David G. Beslow Goldman & Beslow, LLC 7 Glenwood Avenue Suite 311B East Orange, NJ 07017	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

*May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.